

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re \_\_\_\_\_ ) Case No. \_\_\_\_\_

)

)

)

) NOTICE OF MOTION

) PURSUANT TO 11 U.S.C. §522(f)

) FOR AVOIDANCE OF LIEN

)

)

Debtor(s) )

A motion, copy attached, was filed on behalf of the debtor(s) to avoid a lien pursuant to 11 U.S.C. §522(f).

The name and address of the debtor's attorney (or debtor(s), if no attorney) are:

The debtor's address and Taxpayer ID#(s) (last 4 digits) are: \_\_\_\_\_  
\_\_\_\_\_.

If you wish to resist the motion you must, within 14 days of the service date shown below, file both a written response, and a certificate showing a copy of the response has been served on the person named above, with the Clerk of the Bankruptcy Court.

Contents of Response - A response must state the facts upon which the motion is resisted. See Local Form [#717.15](#) for details.

If you file a timely response, and the Court requires a hearing, all parties will be given notice of the hearing date, time, and location.

Failure to Respond - If no timely response is filed, the court may sign an ex parte order, submitted by the debtor(s), granting the motion.

Filing Address - If the 5-digit portion of the Case No. begins with "3" or "4", mail to 1001 SW 5th Ave. #700, Portland OR 97204; OR if it begins with "6" or "7", mail to 405 E 8<sup>th</sup> Ave. #2600, Eugene OR 97401. ECF participants must file electronically.

Clerk, U.S. Bankruptcy Court

I certify on \_\_\_\_\_ copies of this Notice, and the Motion, were served on the Trustee, U.S. Trustee, and all other parties named in the motion, whose names and addresses are listed below (Please Note: Service must be made pursuant to Fed. Bankruptcy Rule 7004 (e.g., 7004(b)(3) for corporations)):

\_\_\_\_\_  
Debtor's or Debtor's Attorney's Signature      OSB #

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re \_\_\_\_\_  
Debtor(s) ) Case No. \_\_\_\_\_  
              )  
              ) MOTION TO AVOID JUDICIAL LIEN ON REAL PROPERTY  
              ) PURSUANT TO 11 U.S.C. §522(f)(1)(A)

Pursuant to 11 U.S.C. §522(f)(1)(A), Debtor moves to avoid a judicial lien on real property referenced below, and alleges as follows:

1. Name and address of lienholder whose lien is to be avoided:
2. The nature of the judicial lien and the date upon which the lien was obtained (include case name, number, county, state, date in which judgment was docketed, and transcription information, if appropriate):
3. Description and address (attach exhibit if necessary) of real property to which judicial lien attaches:
4. Date petition filed: \_\_\_\_\_
5. Fair market value of real property as of petition date: \$\_\_\_\_\_
6. Name(s) and amount(s) of all senior lienholder(s):
7. Present balance owing to senior lienholder(s) plus junior consensual liens on petition date excluding any precomputed interest or other unearned charges: \$\_\_\_\_\_.
8. The description of nature and amount of exemptions impaired:
9. Other facts relevant in determining whether Motion should be granted:
10. In light of the foregoing, and pursuant to 11 U.S.C. §522(f)(1)(A), debtor is entitled to avoid the lien referenced above  in full so that it no longer remains a lien against debtor's real property or  in the amount of \$\_\_\_\_\_ so that it remains a lien against debtor's real property in the amount of \$\_\_\_\_\_.

\_\_\_\_\_  
Debtor's or Debtor's Attorney's Signature

OSB # \_\_\_\_\_

\_\_\_\_\_  
Address

\_\_\_\_\_  
Telephone Number